

Christopher E. Hawk, OSB No. 061635

chawk@grsm.com

W. Gregory Lockwood, OSB No. 114415

wglockwood@grsm.com

GORDON REES SCULLY MANSUKHANI, LLP

121 SW Morrison Street, Suite 1575

Portland, OR 97204

Telephone: (503) 227-8269

Facsimile: (503) 616-3600

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

(Eugene Division)

MICHAEL EVANS,

Plaintiff,

vs.

GUARANTY RV, INC. a/b/n GUARANTY RV
CENTERS,

Defendant.

Case No. 6:19-cv-01062-MK

**STIPULATED MOTION TO
CONTINUE DISCOVERY AND
PRETRIAL DEADLINES**

STIPULATED MOTION

It is stipulated by the parties that all deadlines for completion of discovery and pretrial submissions should be extended for 120 days, as outlined below:

DEADLINE	FROM:	TO:
Discovery Completion	3/9/2020	7/9/2020
Dispositive Motions	4/8/2020	8/6/2020
Joint Alternate Dispute Resolution	30 days after ruling on dispositive motions or 5/8/2020	30 days after ruling on dispositive motions or 6/8/2020

To date, the parties have been diligently engaging in document discovery, which has been voluminous, and written discovery. This motion is made to provide adequate time to complete

document discovery prior to the 15 depositions that the parties expect to take and allow for possible difficulties in scheduling certain non-party witnesses. It is not made with the intent to delay. Thus, for the forgoing reasons, good cause exists to extend the deadlines as outline below.
RESPECTFULLY SUBMITTED:

DATED this 25th day of February, 2020.

GILROY NAPOLI SHORT LAW GROUP

GORDON REES SCULLY MANSUKHANI, LLP



Jeff Napoli, OSB No. 990868
jnapoli@gnslawgroup.com
Veronica R. Rodriguez, OSB No. 181818
veronica@gnslawgroup.com
Attorneys for Plaintiff

/s/ W. Gregory Lockwood

Christopher E. Hawk, OSB No. 061635
chawk@grsm.com
W. Gregory Lockwood, OSB No. 114415
wglockwood@grsm.com
Attorneys for Defendant